

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

|                                 |          |   |
|---------------------------------|----------|---|
| <b>UNITED STATES OF AMERICA</b> | <b>:</b> | <b>CRIMINAL NO. _____</b>                         |
| <b>v.</b>                       | <b>:</b> | <b>DATE FILED: _____</b>                          |
| <b>STEVEN BROWN</b>             | <b>:</b> | <b>VIOLATIONS:</b>                                |
| <b>WILLIAM SUAREZ</b>           | <b>:</b> | <b>21 U.S.C. § 841(a)(1), (b)(1)(A)</b>           |
| <b>ANGEL SANCHEZ</b>            | <b>:</b> | <b>(possession with intent to distribute 50</b>   |
|                                 | <b>:</b> | <b>grams or more of cocaine base (“crack”) -</b>  |
|                                 | <b>:</b> | <b>1 count)</b>                                   |
|                                 | <b>:</b> | <b>18 U.S.C. § 924(c)(1)(A)(i), (B)(i)</b>        |
|                                 | <b>:</b> | <b>(possession of a firearm in furtherance of</b> |
|                                 | <b>:</b> | <b>a drug trafficking crime - 1 count)</b>        |
|                                 | <b>:</b> | <b>18 U.S.C. § 922(g)(1) (convicted felon in</b>  |
|                                 | <b>:</b> | <b>possession of a firearm - 3 counts)</b>        |
|                                 | <b>:</b> | <b>18 U.S.C. § 2 (aiding and abetting)</b>        |
|                                 |          | <b>Notice of forfeiture</b>                       |

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**INDICTMENT**

**COUNT ONE**

**THE GRAND JURY CHARGES THAT:**

On or about December 19, 2003, in Bethlehem, in the Eastern District of  
Pennsylvania, defendants

**STEVEN BROWN,  
WILLIAM SUAREZ, and  
ANGEL SANCHEZ**

knowingly and intentionally possessed with intent to distribute, and aided and abetted the  
possession with intent to distribute of, more than 50 grams, that is, approximately 52.55 grams,  
of a mixture or substance containing a detectable amount of cocaine base (“crack”), a Schedule II  
controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and  
Title 18, United States Code, Section 2.

**COUNT TWO**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2003, in Bethlehem, in the Eastern District of Pennsylvania, defendants

**STEVEN BROWN,  
WILLIAM SUAREZ, and  
ANGEL SANCHEZ**

knowingly possessed, and aided and abetted the possession of, a firearm, that is, a Remington 12 gauge short-barreled shotgun, Model 870, serial number S719575V, with the barrel sawed-off to a length less than 18 inches, loaded with three live rounds of ammunition, and an Ithaca 12 gauge shotgun, Model 37, serial number 371116176, loaded with three live rounds of ammunition, in furtherance of a drug trafficking crime for which each may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine base ("crack"), in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 18, United States Code, Sections 924(c)(1)(A)(i), (B)(i) and 2.

**COUNT THREE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2003, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**STEVEN BROWN,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Remington 12 gauge short-barreled shotgun, Model 870, serial number S719575V, with the barrel sawed-off to a length less than 18 inches, loaded with three live rounds of ammunition, and an Ithaca 12 gauge shotgun, Model 37, serial number 371116176, loaded with three live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FOUR**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2003, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**WILLIAM SUAREZ,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Remington 12 gauge short-barreled shotgun, Model 870, serial number S719575V, with the barrel sawed-off to a length less than 18 inches, loaded with three live rounds of ammunition, and an Ithaca 12 gauge shotgun, Model 37, serial number 371116176, loaded with three live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**COUNT FIVE**

**THE GRAND JURY FURTHER CHARGES THAT:**

On or about December 19, 2003, in Bethlehem, in the Eastern District of Pennsylvania, defendant

**ANGEL SANCHEZ,**

having been convicted in a court of the Commonwealth of Pennsylvania of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed in and affecting interstate commerce a firearm, that is, a Remington 12 gauge short-barreled shotgun, Model 870, serial number S719575V, with the barrel sawed-off to a length less than 18 inches, loaded with three live rounds of ammunition, and an Ithaca 12 gauge shotgun, Model 37, serial number 371116176, loaded with three live rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

**NOTICE OF FORFEITURE**

**THE GRAND JURY FURTHER CHARGES THAT:**

1. As a result of the violations of Title 18, United States Code, Sections 924(c) and 922(g)(1), set forth in this indictment, the defendants

**STEVEN BROWN,  
WILLIAM SUAREZ, and  
ANGEL SANCHEZ**

shall forfeit to the United States of America all firearms and ammunition involved in the commission of such offenses, including, but not limited to:

1. One Remington 12 gauge short-barreled shotgun, Model 870, serial number S719575V, with the barrel sawed-off to a length less than 18 inches,
2. three live rounds of ammunition,
3. One Ithaca 12 gauge shotgun, Model 37, serial number 371116176, and
4. three live rounds of ammunition.

All pursuant to Title 28, United States Code, Section 2461(c), and Title 18, United States Code, Section 924(d).

**A TRUE BILL:**

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**GRAND JURY FOREPERSON**

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**PATRICK L. MEEHAN  
UNITED STATES ATTORNEY**